



## South Coast Air Quality Management District

### Engineering & Compliance

*Policies &  
Procedures*

#### SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

#### MEMORANDUM

**DATE:** July 19, 1987  
**TO:** Senior Engineering Managers and Unit Supervisors  
**FROM:** William J. Dennison, Acting Director of Engineering /s/ WJD  
**SUBJECT:** Pre-Denial Conference

The Enforcement Division has expressed a concern over our handling of the pre-denial conferences. Specifically, Enforcement believes that in certain cases they would like to hear what is said and what conditions or actions the applicant is expected to take concerning the equipment in question. I have agreed that Enforcement should be invited to attend all pre denial conferences involving equipment that has already been constructed and is in operation. When an applicant is to be denied for equipment which is Class I or Class IV Enforcement need not be notified.

The Enforcement Division will assist in explaining those areas which are their responsibility, i.e. telling the company what could result if they miss the 10 day appeal deadline provided by the rules. Other possible areas where they may contribute include those where enforcement has participated in developing information leading to the denial; such as public nuisance problems, or, when the violation was witnessed by an inspector. Where the reason for denial involves other circumstances such as Regulation XIII problems, or Regulation XI, their participation will be limited to that of a concerned observer. They will not comment about the merits of the denial as the denial action is an engineering responsibility. They are welcome to give their input prior to any meeting, and we should listen to their technical expertise accordingly.

The attached forms should be filled out prior to every Class III denial and put in the appropriate receptacle in the Enforcement Manager's (Arnie Stein) office. The forms should be filled out at least three days, and preferably five days prior to the conference to allow the inspector in the field to receive notification and to schedule the meeting. Please use the form attached\*.

If you do not hear from the Enforcement Division concerning the pre-denial conference or they fail to appear, continue on with the pre-denial conference. The Enforcement Division may choose not to attend every pre-denial conference, but we should notify them every time as specified above.

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\*Attachment not available